



2015 SEP 17 AM 10: 21

UTILITIES COMMISSION

GNR-T-15-12

TO:

Idaho Public Utilities Commission ("PUC")

472 W. Washington Street

Boise, ID 83702

ATTN:

Grace Seaman, Utilities Analyst

FROM:

Mike W. McCoy, Vice President - Taxes

Verizon Wireless
One Verizon Place

Attention: Tax Department Alpharetta, GA 30004

Date:

9/15/15

Re:

Idaho RSA 3 Limited Partnership - FEIN: 58-1918883

2014 Idaho Broadband Equipment Investment Credit (Idaho Form 68)

Introduction

Idaho RSA 3 Limited Partnership, an operating entity of the Verizon Wireless ("VzW") business division, is submitting the following application to the Idaho Public Utilities Commission ("PUC") for qualification of broadband equipment in accordance with Procedural Order No. 28784 (attached), in order to claim the Broadband Equipment Investment Tax Credit (Idaho Form 68) for capital asset additions in 2014.

1. Applicant Information

Verizon Wireless ("VzW"), a division of Verizon Communications, Inc. ("Verizon"), is the largest wireless telecommunications provider in the United States, providing wireless services to over 133 million subscribers. VzW is also one of the largest telecommunication and wireless service carriers in Idaho. The company designs, builds and operates global networks, information systems and mobile technologies.

Questions regarding this application and its content should be directed to:

Tom Florino Ernst & Young LLP Tom.Florino@ey.com 212-773-6436

Or

Nick McGuirl Ernst & Young LLP Nick.mcguirl@ey.com 212-773-2591

2. Location of Broadband Equipment

Please refer to the attached 2014 capital asset addition schedule.

3. Description of Broadband Services

Verizon Wireless ("VzW") offers many mobile technologies over its wireless broadband network, including but not limited to: voice services, data services, text and picture messaging, location-based services, over-the-air downloadable applications, video on demand, and push-to-talk (PTT).

VzW uses CDMA2000 (Code Division Multiple Access) technology to support LTE for 4G voice and broadband data, in addition to three other generations of CDMA-based cellular network technologies (2G voice and data, 2.5G voice and data, and 3G data).

4. Broadband Network Transmission Rates

Verizon Wireless ("VzW") broadband network infrastructure has data transmission rates of between 300K and 3M bits per second for subscriber downloads (receive) and uploads (send). This range exceeds the rate of at least 200,000 bits per second to a subscriber (download/receive) and at least 125,000 bits per second from a subscriber (upload/send), required under statute (Idaho Code § 63-30291).

5. List of Qualified Broadband Equipment

Please refer to the attached 2014 capital asset addition schedule.

6. Installation Dates - Qualified Broadband Equipment

Please refer to the attached 2014 capital asset addition schedule.

7. Description of Broadband Equipment / Network

Idaho RSA 3 Limited Partnership, an operating entity of the Verizon Wireless ("VzW") business division, has 50 asset additions totaling \$75,945.05 in 2014 that are "qualified broadband equipment," which is eligible for the 3% Broadband Equipment Investment Tax Credit (Idaho Form 68) under Idaho Code § 63-30291. This qualified broadband equipment directly facilitates data transmission to and from service subscribers and is integral to the broadband network.

The total 2014 tax credit claim is \$2,278.35. Please see below and attached for further detail.

Row Labels Cour	nt of CATEGORY	S	um of Cost	Sum of	3% TAX CREDIT
□Idaho RSA 3 LP	50	\$	75,945.05	\$	2,278.35
Amplifier - Data Transmission	2	\$	4,685.32	\$	140.56
Antenna Equip - Data Transmission	4	\$	678.94	\$	20.37
Cable - Data Transmission	9	\$	1,101.10	\$	33.03
Card Device - Data Transmission	1	\$	240.31	\$	7.21
Electrical Equipment - Broadband Network	3	\$	157.14	\$	4.71
Power Device - Data Transmission	24	\$	40,816.89	\$	1,224.51
Telecomm Hardware - Data Transmission	3	\$	788.67	\$	23.66
Transmitter - Signal Data Transmission	4	\$	27,476.68	\$	824.30

8. Broadband Network Subscribers

- A. % and # of potential Idaho subscribers that could be served by the network:
 - 100% of all subscribers
- B. % and # of potential non-Idaho subscribers that could be served by the network:
 - There are no non-Idaho customers that could be served with the broadband equipment placed in service.

9. Statement Certifying Qualification of Eligible Broadband Equipment

Verizon Wireless ("VzW") has reviewed the applicable statutes and regulations and hereby certifies that the attached 2014 capital asset addition schedule contains "qualified broadband equipment" that qualifies for the Broadband Equipment Investment Tax Credit (Idaho Form 68) under Idaho Code § 63-30291.

Signed and Certified:

Date:

ALL Verizon Wireless ("VzW") Operating Entities 2014 Idaho Qualified Broadband Equipment Qualified Asset Summary

v Labels Cou ellco Partnership	int of CATEGORY 1,461	\$	Sum of Cost 2,998,116.60	\$	um of 3% TAX CREI 89,943
Antenna Equip - Data Transmission	1,461	. \$	389,575.32	\$ \$	11,687
Broadband Router - Data Transmission	. 68	\$	47,715.23	\$	1,431.
Cable - Data Transmission	280	\$	345,252.37	\$	10,357
Card Device - Data Transmission	66	\$	122,154.80	\$	3,664
Cell Tower - Data Transmission	38	\$	133,363.52	\$	4,000
Electrical Equipment - Broadband Network	19	\$	1,529.99	\$	4,000
GPS Receiver - Data Transmission	2	\$	354.00	\$	10
Hardware - Data Transmission	23	\$	200,842.00	\$	6,025
Microwave Equipment - Data Transmission	73	\$	38,236.01	\$	1,147
Power Device - Data Transmission	223	\$	321,856.40	\$	9,655
Radio Frequency Device - Data Transmission	120	\$	500,451.11	\$	15,013
Remote Terminal Unit - Data Transmission	13	\$	143,160.60	\$	4,294
Signal Filter - Data Transmission	175	\$	162,518.31	\$	4,875
Switch Module - Data Transmission	6	\$	15,234.56	\$	4,873
Telecomm Equip - Data Transmission	5	\$	7,956.25	\$	238
Transmitter - Signal Data Transmission	176	\$	567,916.13		
ellular Inc Network Corp	596	\$ \$	1,052,085.77	\$	17,037
Amplifier - Data Transmission	19	 \$	27,989.89	\$ \$	31,562
Antenna Equip - Data Transmission	94	\$			839
Broadband Router - Data Transmission	2	\$	94,172.74 1,994.89	\$	2,825 59
Cable - Data Transmission	171	\$	38,088.67	\$	
Card Device - Data Transmission	171	\$		\$	1,142 752
Cell Tower - Data Transmission		\$	25,095.55 4,489.97		
	1 41	\$		\$	134
Electrical Equipment - Broadband Network	6	\$	5,498.69	\$	164
Microwave Equipment - Data Transmission Power Device - Data Transmission	150	\$	1,693.73	\$	14.283
		\$	479,463.29	\$	14,383
Radio Frequency Device - Data Transmission	5	1.5	15,941.09	\$	478
Signal Amplification Device - Data Transmission	4	\$	29,806.93	\$	894
Switch Device - Data Communication	2	\$	104.40	\$	511
Telecomm Hardware - Data Transmission	44	\$	17,064.16	\$	511
Transmitter - Signal Data Transmission	45	\$	310,681.77	\$	9,320
aho 6 Clark RSA LP	1,364 42	<u>\$</u> \$	2,371,003.77	<u>\$</u> \$	71,130
Amplifier - Data Transmission Antenna Equip - Data Transmission	235	\$	58,382.22 213,033.70		1,751 6,391
Broadband Router - Data Transmission		150		\$	
Cable - Data Transmission	1 383	\$ \$	987.85	\$	29
Card Device - Data Transmission	52	\$	100,905.86	\$	3,027
Cell Site Hardware - Data Transmission			103,442.25 12,826.49	\$	3,103
	1	\$		\$	384
Cell Tower - Data Transmission	8	\$	85,918.81	\$	2,577
Electrical Equipment - Broadband Network	87	\$	21,950.20	\$	658
Power Device - Data Transmission	321	\$	988,597.52	\$	29,657
Radio Frequency Device - Data Transmission	2	\$	6,563.49	\$	196
Signal Amplification Device - Data Transmission	1	\$	6,549.93	\$	196
Switch Device - Data Communication	3	\$	156.60	\$	4
Telecomm Equip - Data Transmission	5	\$	5,119.73	\$	153
Telecomm Hardware - Data Transmission	96	\$	45,425.09	\$	1,362
Transmitter - Signal Data Transmission	127	\$	721,144.03	\$	21,634
aho RSA 2 LP	281	\$	404,269.62	\$	12,128
Antenna Equip - Data Transmission	39	\$	57,162.44	\$	1,714
Cable - Data Transmission	56	\$	12,736.86	\$	382
Card Device - Data Transmission	3	\$	1,430.69	\$	42
Cell Site Hardware - Data Transmission	1	\$	12,826.49	\$	384
Cell Tower - Data Transmission	1	\$	4,145.33	\$	124
Electrical Equipment - Broadband Network	33	\$	4,394.05	\$	131
Power Device - Data Transmission	110	\$	203,581.94	\$	6,107
Telecomm Hardware - Data Transmission	19	\$	8,522.80	\$	255
Transmitter - Signal Data Transmission	19	\$	99,469.02	\$	2,984
aho RSA 3 LP	50	\$	75,945.05	\$	2,278
Amplifier - Data Transmission	2	\$	4,685.32	\$	140
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ALL Verizon Wireless ("VzW") Operating Entities 2014 Idaho Qualified Broadband Equipment Qualified Asset Summary

Row Labels	Count of CATEGORY	#5	Sum of Cost	Sı	um of 3% TAX CREDIT
Cable - Data Transmission	9	\$	1,101.10	\$	33.03
Card Device - Data Transmission	1	\$	240.31	\$	7.21
Electrical Equipment - Broadband Network	3	\$	157.14	\$	4.71
Power Device - Data Transmission	24	\$	40,816.89	\$	1,224.51
Telecomm Hardware - Data Transmission	3	\$	788.67	\$	23.66
Transmitter - Signal Data Transmission	4	\$	27,476.68	\$	824.30
Verizon Wireless (VAW) LLC	4,572	\$	9,863,489.83	\$	295,904.69
Amplifier - Data Transmission	125	\$	178,833.25	\$	5,365.00
Antenna Equip - Data Transmission	626	\$	883,317.86	\$	26,499.54
Broadband Router - Data Transmission	44	\$	40,739.88	\$	1,222.20
Cable - Data Transmission	1,367	\$	1,358,097.85	\$	40,742.94
Card Device - Data Transmission	152	\$	361,310.61	\$	10,839.32
Cell Site Hardware - Data Transmission	11	\$	138,178.83	\$	4,145.36
Cell Tower - Data Transmission	53	\$	463,889.91	\$	13,916.70
Electrical Equipment - Broadband Network	185	\$	32,704.73	\$	981.14
GPS Receiver - Data Transmission	6	\$	1,239.00	\$	37.17
Hardware - Data Transmission	87	\$	784,098.00	\$	23,522.94
Microwave Equipment - Data Transmission	81	\$	37,498.86	\$	1,124.97
Power Device - Data Transmission	944	\$	2,042,390.47	\$	61,271.71
Radio Frequency Device - Data Transmission	73	\$	185,121.56	\$	5,553.65
Remote Terminal Unit - Data Transmission	11	\$	39,028.30	\$	1,170.85
Signal Amplification Device - Data Transmission	3	\$	24,961.87	\$	748.86
Signal Filter - Data Transmission	20	\$	15,627.50	\$	468.83
Switch Device - Data Communication	3	\$	156.60	\$	4.70
Switch Module - Data Transmission	4	\$	54,751.13	\$	1,642.53
Telecomm Equip - 4G/LTE Data	2	\$	4,277.72	\$	128.33
Telecomm Equip - Data Transmission	10	\$	26,652.32	\$	799.57
Telecomm Hardware - Data Transmission	233	\$	280,425.04	\$	8,412.75
Transmitter - Signal Data Transmission	532	\$	2,910,188.54	\$	87,305.66
Grand Total	8,324	\$	16,764,910.64	\$	502,947.32

SUBTOTAL: Cellco Partnership and Verizon Wireless (VAW) LLC (Disregarded Entity)

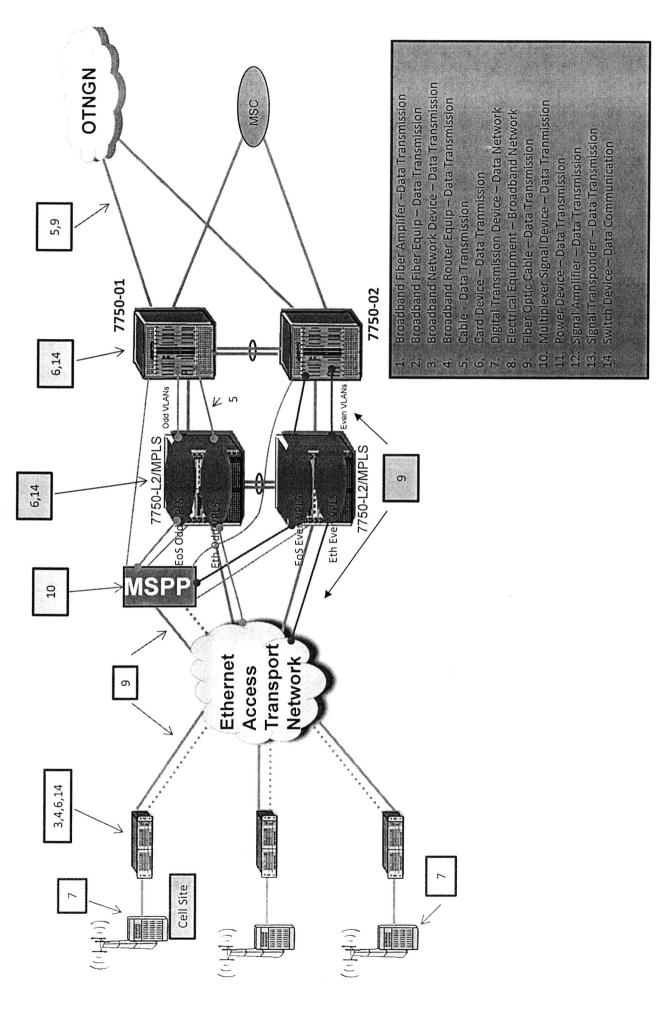
Cellco Partnership Verizon Wireless (VAW) LLC (Disregarded Entity)

Verizon Wireless (VAW) LLC (Disregarded Entity)		NO SECUL		SAMPLE S	
Row Labels	Count of CATEGORY		Sum of Cost		ım of 3% TAX CREDIT
Cellco Partnership	1,461	\$	2,998,116.60	\$	89,943.50
Antenna Equip - Data Transmission	174	\$	389,575.32	\$	11,687.26
Broadband Router - Data Transmission	68	\$	47,715.23	\$	1,431.46
Cable - Data Transmission	280	\$	345,252.37	\$	10,357.57
Card Device - Data Transmission	66	\$	122,154.80	\$	3,664.64
Cell Tower - Data Transmission	38	\$	133,363.52	\$	4,000.91
Electrical Equipment - Broadband Network	19	\$	1,529.99	\$	45.90
GPS Receiver - Data Transmission	2	\$	354.00	\$	10.62
Hardware - Data Transmission	23	\$	200,842.00	\$	6,025.26
Microwave Equipment - Data Transmission	73	\$	38,236.01	\$	1,147.08
Power Device - Data Transmission	223	\$	321,856.40	\$	9,655.69
Radio Frequency Device - Data Transmission	120	\$	500,451.11	\$	15,013.53
Remote Terminal Unit - Data Transmission	13	\$	143,160.60	\$	4,294.82
Signal Filter - Data Transmission	175	\$	162,518.31	\$	4,875.55
Switch Module - Data Transmission	6	\$	15,234.56	\$	457.04
Telecomm Equip - Data Transmission	5	\$	7,956.25	\$	238.69
Transmitter - Signal Data Transmission	176	\$	567,916.13	\$	17,037.48
Verizon Wireless (VAW) LLC	4,572	\$	9,863,489.83	\$	295,904.69
Amplifier - Data Transmission	125	\$	178,833.25	\$	5,365.00
Antenna Equip - Data Transmission	626	\$	883,317.86	\$	26,499.54
Broadband Router - Data Transmission	44	\$	40,739.88	\$	1,222.20
Cable - Data Transmission	1,367	\$	1,358,097.85	\$	40,742.94
Card Device - Data Transmission	152	\$	361,310.61	\$	10,839.32
Cell Site Hardware - Data Transmission	11	\$	138,178.83	\$	4,145.36

ALL Verizon Wireless ("VzW") Operating Entities 2014 Idaho Qualified Broadband Equipment Qualified Asset Summary

Row Labels	Count of CATEGORY	Sum of Cost	Sı	um of 3% TAX CREDIT
Cell Tower - Data Transmission	53	\$ 463,889.91	\$	13,916.70
Electrical Equipment - Broadband Network	185	\$ 32,704.73	\$	981.14
GPS Receiver - Data Transmission	6	\$ 1,239.00	\$	37.17
Hardware - Data Transmission	87	\$ 784,098.00	\$	23,522.94
Microwave Equipment - Data Transmission	81	\$ 37,498.86	\$	1,124.97
Power Device - Data Transmission	944	\$ 2,042,390.47	\$	61,271.71
Radio Frequency Device - Data Transmission	73	\$ 185,121.56	\$	5,553.65
Remote Terminal Unit - Data Transmission	11	\$ 39,028.30	\$	1,170.85
Signal Amplification Device - Data Transmission	3	\$ 24,961.87	\$	748.86
Signal Filter - Data Transmission	20	\$ 15,627.50	\$	468.83
Switch Device - Data Communication	3	\$ 156.60	\$	4.70
Switch Module - Data Transmission	4	\$ 54,751.13	\$	1,642.53
Telecomm Equip - 4G/LTE Data	2	\$ 4,277.72	\$	128.33
Telecomm Equip - Data Transmission	10	\$ 26,652.32	\$	799.57
Telecomm Hardware - Data Transmission	233	\$ 280,425.04	\$	8,412.75
Transmitter - Signal Data Transmission	532	\$ 2,910,188.54	\$	87,305.66
Grand Total	6,033	\$ 12,861,606.43	\$	385,848.19

Verizon - Wireless Broadband Network Assets



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Power Device - Data Transmission Y S Telecomm Hardware - Data Transmission Y S Telecomm Hardware - Data Transmission Y S Transmitter - Signal Data Transmi		Transmission	>	s	7.74
Telecomm Hardware - Data Transmission Y S Telecomm Hardware - Data Transmission Y S Telecomm Hardware - Data Transmission Y S Transmitter - Signal Data Transmission Y S		Transmission	>	s	7.74
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE ISSUANCE OF A)	
PROCEDURAL ORDER TO FACILITATE THE)	CASE NO. GNR-T-01-10
REVIEW OF APPLICATIONS TO DETERMINE)	
WHETHER BROADBAND EQUIPMENT MEETS)	
THE ELIGIBILITY REQUIREMENTS FOR)	ORDER NO. 28784
INVESTMENT TAX CREDITS.)	
)	

Earlier this year the Legislature enacted and the Governor signed House Bill 377 authorizing income tax credits for the installation of qualifying broadband infrastructure in Idaho. *Idaho Code* § 63-3029B(3)(a)(ii). In particular, Section 63-3029I allows a taxpayer to receive an investment tax credit for eligible broadband equipment installed between January 1, 2001 and December 31, 2005.

"Qualified broadband equipment" is defined as those network facilities capable of transmitting signals that are at a rate of at least 200,000 bits per seconds (bps) to a subscriber and at least 125,000 bps from a subscriber. *Idaho Code* § 63-3029I(3)(b). To be eligible for the tax credit, the taxpayer must apply and obtain "from the Idaho public utilities commission an order confirming that installed equipment is qualified broadband equipment." *Idaho Code* § 63-3029I(4). This section also provides that the Commission "may issue procedural orders necessary to implement this section." *Id*.

PROCEDURAL HISTORY

On June 14, 2001, the Commission issued a Proposed Order to implement its responsibilities under the broadband tax credit statute. IDAPA 31.01.01.312. The Proposed Order identified information that should be contained in an application to determine whether the installed equipment is "qualified" broadband equipment. Persons interested in commenting on the Proposed Order were invited to submit written comments no later than July 5, 2001. The Commission received two comments.¹

ORDER NO. 28784

¹ On June 28, 2001, Avista Communications petitioned to intervene in this matter. Although it filed no comments, Avista's Petition was granted in a separate Order.

THE COMMENTS

Verizon Northwest and Qwest Corporation each filed brief comments. In its comments, Verizon "applaud[ed] the Commission's efforts to implement House Bill 377 and believes that this should help to speed deployment of broadband infrastructure in Idaho." Verizon recommended that information filed in response to paragraph Nos. 7 and 8 be considered as confidential information. Items 7 and 8 provide:

- 7. Provide a written description (including basic schematics or general drawings) of the relevant broadband network including a description of how the installed equipment is "an integral part" of a broadband network.
- 8. Quantify the percentage and number of potential Idaho subscribers that could be served with the broadband equipment and the percentage and number of non-Idaho subscribers that will be/could be served by the broadband network.

Proposed Order at 2.

In its comments, Qwest agreed that "the information described in the Proposed Order is appropriate for determination of whether equipment is qualified broadband equipment." Qwest Comments at 1. In particular, Qwest agreed with Item No. 4 in the Proposed Order which requires an application to state the transmission rate of the broadband network. The Company stated that its understanding of the phrase "qualified broadband equipment" includes

items that are necessary and integral for the broadband network to operate, but which are not part of the actual transmission of the signal. Thus, Qwest agrees that an application should set out the transmission rate for the <u>network</u>, and that the transmission rate does not apply to specific items of equipment.

Qwest Comments at 2 (emphasis added).

DISCUSSION

To implement our responsibilities under the broadband tax credit, the Commission finds that it is appropriate to issue a procedural order regarding broadband equipment applications. Both comments supported adoption of a procedural order. Turning to Verizon's comments, we believe the Commission's existing Rules of Procedure provide appropriate protection for trade secret information contained in materials submitted to the Commission. *See* Rule 67.03, IDAPA 31.01.01.067.03. As for Qwest's comments, the Commission amends Item

No. 4 to reflect that it is the network of broadband equipment that must satisfy the transmission rates set out in *Idaho Code* § 63-3029I(3)(b).

Applicants shall submit the following information in applications when seeking an Order whether installed equipment is "qualified" broadband equipment.

- 1. Name and address of applicant including the contact person in the event there are questions regarding the application and its content. Indicate whether the applicant is a telecommunications carrier, a commercial mobile service carrier, a cable or open video operator, a satellite carrier, or other type of wireless carrier.
- 2. Identify the area or location where the equipment is installed in Idaho.
- 3. Describe the type of broadband service(s) offered to the public in Idaho.
- 4. State the network transmission rate in bits per second at which subscribers to the relevant broadband network can receive and send (download and upload).
- 5. Provide a specific list of the equipment or types of equipment that the applicant is requesting that the Commission determine is "qualified broadband equipment" as defined in *Idaho Code* § 63-3029I(3)(b). List the brand, manufacturer, model numbers, or other distinguishing features of the installed equipment.
- 6. Provide the date(s) or time period(s) when the broadband equipment was installed in Idaho.
- 7. Provide a written description (including basic schematics or general drawings) of the relevant broadband network including a description of how the installed equipment is "an integral part" of a broadband network.
- 8. Quantify the percentage and number of potential Idaho subscribers that could be served with the broadband equipment and the percentage and number of non-Idaho subscribers that will be/could be served by the broadband network.
- 9. Enclose a statement certifying that the applicant has read the applicable statutes for broadband investment income tax credit and the applicant believes that the subject broadband equipment qualifies for the tax credit under *Idaho Code* § 63-3029I.

ORDER

IT IS HEREBY ORDERED that taxpayers submitting applications for the Commission to determine whether installed broadband equipment is eligible for the Idaho state tax credit must include the information set out in the body of this Order.

THIS IS A FINAL ORDER. Any person interested in this Order (or in issues finally decided by this Order) or in interlocutory Orders previously issued in this Case No. GNR-T-01-10 may petition for reconsideration within twenty-one (21) days of the service date of this Order with regard to any matter decided in this Order or in interlocutory Orders previously issued in this Case No. GNR-T-01-10. Within seven (7) days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. See *Idaho Code* § 61-626.

DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho, this //* day of July 2001.

PAUL KJELLANDER, PRESIDENT

MARSHA H. SMITH, COMMISSIONER

DENNIS S. HANSEN, COMMISSIONER

ATTEST:

Jean D. Jewell Commission Secretary

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